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Remarks

In the Office Action, the Examiner noted that the claims 1-25 are pending in the application and that the claims 1-25 are rejected over a prior art reference. By this response, claims 1, 11, 14, 16, 20 and 23 have been amended, claims 4, 22 and 25 have been cancelled, and claims 26 and 27 have been added. Thus, claims 1-27 remain pending in the application. Applicant respectfully traverses the rejections for the reasons indicated below.

*Rejection under 35 U.S.C. § 112, second paragraph*

Claims 1, 16, 20 and 23 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite. While the Applicant is of the opinion that claims 1, 16, 20 and 23 are in fact definite, Applicant has amended the claims to further emphasize the claimed invention as suggested by the Examiner.

With respect to claims 1, the Examiner requests the applicant to specify what exactly is considered by the terms "structured and unstructured electronic data," and the attributes and executable qualities of these terms. Applicants respectfully submits that one skilled in the art routinely would interpret the term "structured electronic data" to refer to data that resides in fixed fields within a record or file. Relational databases and spreadsheets are examples of structured data. (See Structured data definition at [http://www.pcmag.com/encyclopedia\\_term/0,2542,t=unstructured+data&i=53486,00.asp](http://www.pcmag.com/encyclopedia_term/0,2542,t=unstructured+data&i=53486,00.asp)) Further, one skilled in the art routinely would interpret the term "unstructured electronic data" to refer to data that does not reside in fixed locations. Examples of unstructured data may include audio, video and free-form text in a word processing document or an email. (See Unstructured data definition at [http://www.pcmag.com/encyclopedia\\_term/0,2542,t=structured+data&i=52162,00.asp](http://www.pcmag.com/encyclopedia_term/0,2542,t=structured+data&i=52162,00.asp))

With respect to claims 1, 16, 20 and 23, the Examiner notes that the limitation "at least one reference" is vague. Claims 1, 16, 20 and 23 have been amended to further recite what the reference includes. The Examiner further notes that the limitations "providing information" and "at least one project" are broad and vague and requests the Applicant to provide specific, detailed

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data about the "information" and the "project" that is being used and implemented within this invention. Applicants respectfully submit that the present invention responds to the need for efficient and effective filing and retrieval of enterprise-wide electronic information, with integrated project management functionality. One or more aspects of the present invention provide for dynamically managing the relationships among multiple items of electronic information by allowing users to quickly identify the business context of documents and other content, and to store the information within its proper context, optionally automatically linking the content to other related items. (Specification, Page 9, lines 12-19)

Accordingly, Applicants respectfully submits that the claims satisfy the requirements under 35 U.S.C. §112, second paragraph. Withdrawal of this rejection is respectfully requested.

#### *Claim Objections*

Claims 11 and 14 have been objected to for not complying with the requirements of 35 U.S.C. §112, second paragraph. Specifically, Examiner identifies that the claim scope is uncertain since the trademark or trade name cannot be used properly to identify any particular material or product. While the Applicant is of the opinion that claims 11 and 14 are in fact definite, Applicant has amended the claims to further emphasize the claimed invention as suggested by the Examiner.

Accordingly, Applicants respectfully submits that the claims satisfy the requirements under 35 U.S.C. §112, second paragraph. Withdrawal of this rejection is respectfully requested.

#### *Rejection under 35 U.S.C. § 102(e)*

Claims 1-25 are rejected under 35 U.S.C. §102(e) as being anticipated by Sheldon et al. (US Patent Number 6,708,205), hereafter "Sheldon."

Applicants respectfully traverse the rejection and respectfully submit that the presently claimed invention is not described by Sheldon. Applicants discuss the rejection below as it applies to (a) independent claims 1, 16, 20 and 23; (b) dependent claims 2-15, 17-19, 21-22 and 24-25.

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The present invention responds to the need for efficient and effective filing and retrieval of enterprise-wide electronic information, with integrated project management functionality. One or more aspects of the present invention provide for dynamically managing the relationships among multiple items of electronic information by allowing users to quickly identify the business context of documents and other content, and to store the information within its proper context, optionally automatically linking the content to other related items. Furthermore, one or more aspects of the present invention provide for project management functionality directly within the filing system, producing dynamic workspaces. Hence, individuals working on a specific project or transaction may have "real time" access to all relevant information. Moreover, the invention is optionally integrated into conventional primary communication or information creation platforms, like e-mail or Word, etc., with all of the product's capabilities being delivered from within the familiar setting of a typical user interface, such as Microsoft Outlook. (Specification, Page 9, lines 11- Page 10, line 6)

A designated user has in one embodiment a substantially or completely unified view of a project, provided by one or more aspects of the present invention. The designated user might be supervising multiple projects, for example, an underwriter, CEO or CFO of the firm. For example, the supervisory user can see every transaction to which they have access, and can drill down into various transactions and view summaries and/or details, etc. In the insurance industry, for example, the question might arise, "have we done any underwriting of aircraft risk through the broker XYZ?" The user could put in retrieval criteria including, XYZ and aircraft risk. The system retrieves each e-mail, legal document, pricing model, etc. for XYZ and aircraft risk. Accordingly, one or more embodiments of the present invention allow (i) viewing and sorting projects for which the user is an owner or team member and (ii) searching for additional projects based on specific criteria, including for example keywords, project parameters (e.g., owner, team members, name, project status, etc.) and dates (e.g., due dates, completed dates, last modified dates, created on dates, etc.). (Specification, Page 135:20-136:12)

One or more aspects of the present invention advantageously provide optional layered access. For example, one or more levels of peer groups may be provided within an organization. While one or more individuals within a single or multiple peer groups may have permission to

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see the same projects, a particular user's keyword-level permission (e.g., read, read-write, no access) can limit them from seeing all or portions of the content linked to these projects, such that the same project appears to have different content when viewed by different users. Permission to review a project and associated items can be granted to one or more peer groups. Thus, a user within a certain peer group can access a project (for example, without being a team member), and review, e.g., most recent e-mails. (Specification, Page 140:3-12)

**(a) Independent claim 1, 16, 20 and 23**

Claim 1 states in combination:

In a computer-implemented system, a method for at least one of controlling access, overseeing, and managing at least one of electronic information including at least one of structured and unstructured electronic data, documentation, and other information, a plurality of items comprising the electronic information, and of a plurality of projects comprising at least a portion of the plurality of items, said method comprising at least one of the sequential, non-sequential, and sequence independent steps of:

(A) associating at least one user with at least one reference, wherein the at least one user is indicated as having at least one access level of a plurality of access levels, wherein the at least one reference includes at least one of: a unique identifier, a keyword, a root term, a portion of a keyword, and a plurality of words;

(B) associating the at least one reference with at least one of at least one item and at least one project;

(C) associating a plurality of users, including the at least one user, with at least one group, and assigning the at least one group access level to the at least one of the at least one item and the at least one project;

(D) responsive to the at least one user, providing information representative of the at least one of the at least one item and the plurality of items in the at least one project associated with the at least one of the least one reference and the at least one group; and

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(E) providing the at least one item to the at least one user with the at least one access level corresponding to the at least one reference associated therewith...

Applicant respectfully submits that the cited reference (Sheldon) is not relevant to the above-identified claims.

Without conceding that Sheldon discloses any of the features of the present invention, Sheldon is concerned with providing "a flexible and customizable electronic mail management system ... [that] allows users to create multiple inboxes, read boxes, and sent boxes of a root e-mail directory to easily sort and control their electronic mail flow...[and] allows users to control electronic mail delivery on a per-folder, per-sender basis." (Col. 4, lines 44-50). The method disclosed by Sheldon is not related to "a method for at least one of controlling access, overseeing, and managing at least one of electronic information including at least one of structured and unstructured electronic data, documentation, and other information, a plurality of items comprising the electronic information, and of a plurality of projects comprising at least a portion of the plurality of items," as recited in claim 1. Instead, Sheldon teaches a method wherein "users can dynamically create multiple e-mail addresses and access mail from all of the addresses from a single user interface." (Col. 4, lines 55-68)

**Sheldon does not** "associate[e] at least one user with at least one reference, wherein the at least one user is indicated as having at least one access level of a plurality of access levels, wherein the at least one reference includes at least one of: a unique identifier, a keyword, a root term, a portion of a keyword, and a plurality of words" and "associate[e] the at least one reference with at least one of at least one item and at least one project," as recited in claim 1. Unlike the claimed invention, Sheldon provides a method that "allows a user to dynamically generate 'suffix' mail accounts with corresponding suffix mail folders for their root e-mail account," wherein the "term 'root' e-mail account refers to an e-mail account which includes a username and a domain name; e.g. username@(domainname.com... [and] [t]he term 'suffix' is meant ... to refer to an additional term which is separated from the username by a delimiter such as '.', '\_', '-', and the like." (Col. 4, line 55 - Col. 5, line 1).

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Sheldon is further concerned with providing "an Access Control ... [that] allow the user to modify the access status of the displayed e-mail message," specifically the "access status of the sender of the e-mail." (Col. 15, lines 55-58) **Sheldon neither teaches nor suggests** "associating at least one user with at least one reference, wherein the at least one user is indicated as having at least one access level of a plurality of access levels," as recited in claim 1. Sheldon discloses the use of "suffix directory [that] includes three default sub-directories: 'inbox', 'sent' and 'read'," wherein the "'inbox' directory contains all the e-mails that have been sent to the suffix account and that have not been rejected," and "includes two sections: Accepted and Hold/New Sender [that] contains all the new e-mails that have been received from senders that are in the address book and have "Accepted" status ... [and] all the new e-mails from the senders who are either registered in the address book and have a Hold/New Sender status for the suffix account in the access book, or are not registered in the address book." (Col. 10, lines 15-29) There is no disclosure or suggestion in Sheldon of "associating the at least one reference with at least one of at least one item and at least one project," as recited in claim 1

Similar arguments apply to claims 16, 20 and 23 as well as addresses limitations presented in each of these claims when each is interpreted for the combination of limitations recited therein.

**(b) Dependent claims 2-15, 17-19, 21-22 and 24-25**

In view of the arguments presented above for the independent claims 1, 16, 20 and 23, the Applicant respectfully submits that the corresponding dependent claims 2-15, 17-19, 21-22 and 24-25 are allowable for the reasons discussed above as well as additional limitations recited in each dependent claim also interpreted in combination.

Sheldon **does not** disclose the step of "denying access to at least one other user wherein at least one of the at least one reference and the at least one project are not associated with the at least one other user," as recited in claim 7. Instead, **Sheldon is concerned with designating the "access status of the sender of the e-mail... [and] applies the access status to the root/username directory and all suffix directories."** (Col. 15, lines 58-64) Sheldon merely discloses that "[i]f an e-mail address is designated as 'accepted', then messages received from

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that e-mail address will be placed into the appropriate inbox for the destination address (which can be the root/username or a suffix address) [and] [i]f an e-mail address is designated as 'rejected', then messages received from that e-mail address will be blocked."

Examiner refers to Figs. 1a-1b and Figs. 4a-10a to suggest that Sheldon discloses the step of "re-associating the at least one user with the at least one reference, wherein the re-associating further comprises at least one of: removing the at least one user from the at least one reference, adding the at least one user to the at least one reference, and reassigning at least one user in at least one group associated with the at least one project," as recited in claim 9 and the step of "at least one of selecting the at least one project and listing the plurality of items in the project, and responsive to a selection of at least one of the plurality of items, displaying information characterizing the item, via a native application cooperating therewith," as recited in claim 10. Instead, Sheldon shows "a preferred graphical user interface [for an e-mail messaging system]... which includes a masthead window section 20, a body window section 10 and a directory window," and exemplary screen displays with the "access" directory button selected, the "addresses" directory button selected, the commercial suffix "CNN" selected, the user created suffix "newsletters" selected, the "options" button selected, a "Delete Suffix Warning Page", and the "create suffix" button selected. (Figs. 1a-b, 4a-10a). **Sheldon neither teaches nor suggests "re-associating the at least one user with the at least one reference,** wherein the re-associating further comprises ... reassigning at least one user in at least one group associated with the at least one project," as recited in claim 3. Similar arguments apply for claim 19.

Similar arguments apply to claims 2-6, 8, 11-15, 17-18, 21-22 and 24-25 as well as addresses limitations presented in each of these claims when each is interpreted for the combination of limitations recited therein.

Claims 2-15, 17-19, 21-22 and 24-25 depend directly or indirectly from claim 1 and are deemed to be allowable for reasons discussed above as well as additional limitations recited in each dependent claim also interpreted in combination.

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In view of the above, Applicant respectfully submit that claims 1-25 are not anticipated by the cited reference and respectfully request that the rejection under 35 U.S.C. § 102(e) of these claims be withdrawn.



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**Conclusion**

Applicant respectfully submits that, as described above, the cited prior art does not show or suggest the combination of features recited in the claims. Applicant does not concede that the cited prior art shows any of the elements recited in the claims. However, Applicant has provided specific examples of elements in the claims that are clearly not present in the cited prior art.

Applicant strongly emphasizes that one reviewing the prosecution history should not interpret any of the examples Applicant has described herein in connection with distinguishing over the prior art as limiting to those specific features in isolation. Rather, Applicant asserts that it is the combination of elements recited in each of the claims, when each claim is interpreted as a whole, which is patentable. Applicant has emphasized certain features in the claims as clearly not present in the cited references, as discussed above. However, Applicant does not concede that other features in the claims are found in the prior art. Rather, for the sake of simplicity, Applicant is providing examples of why the claims described above are distinguishable over the cited prior art.

Applicant wishes to clarify for the record, if necessary, that the claims have been amended to expedite prosecution and/or explicitly recite that which is already present within the claims. Moreover, Applicant reserves the right to pursue the original and/or complimentary subject matter recited in the present claims in a continuation application.

Any claims that have been cancelled are hereby cancelled without prejudice or disclaimer, and Applicant reserves the right to further prosecute these claims in continuing applications. In addition, Applicant has attempted to claim all embodiments disclosed in the present application, and no disclaimer of any embodiments is hereby intended by the presently pending claims.

Any narrowing amendments made to the claims in the present Amendment are not to be construed as a surrender of any subject matter between the original claims and the present claims; rather merely Applicant's best attempt at providing one or more definitions of what the

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Applicant believes to be suitable patent protection. In addition, the present claims provide the intended scope of protection that Applicant is seeking for this application. Therefore, no estoppel should be presumed, and Applicant's claims are intended to include a scope of protection under the Doctrine of Equivalents and/or statutory equivalents, i.e., all equivalents that are substantially the same as the presently claimed invention.

Further, Applicant hereby retracts any arguments and/or statements made during prosecution that were rejected by the Examiner during prosecution and/or that were unnecessary to obtain allowance, and only maintains the arguments that persuaded the Examiner with respect to the allowability of the patent claims, as one of ordinary skill would understand from a review of the prosecution history. That is, Applicant specifically retracts statements that one of ordinary skill would recognize from reading the file history were not necessary, not used and/or were rejected by the Examiner in allowing the patent application.

For all the reasons advanced above, Applicant respectfully submits that the rejections have been overcome and should be withdrawn.

For all the reasons advanced above, Applicant respectfully submits that the Application is in condition for allowance, and that such action is earnestly solicited.

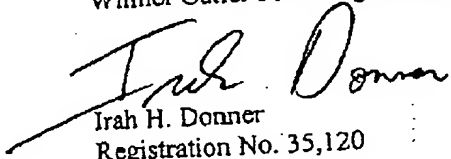
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In the event that an Extension of Time is required, or which may be required in addition to that requested in a petition for an Extension of Time, the Commissioner is requested to grant a petition for that Extension of Time which is required to make this response timely and is hereby authorized to charge any fee for such an Extension of Time or credit any overpayment for an Extension of Time to Deposit Account No. 08-0219.

Respectfully submitted,  
Wilmer Cutler Pickering Hale and Dorr LLP  
Irah H. Donner  
Registration No. 35,120399 Park Avenue  
New York, NY 10022  
TEL (212) 230-8887  
FAX (212) 230-8888Date: 11/20/06

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